

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DORIS R. KING,
 Plaintiff,
 v.
 UNITED STATES OF AMERICA
 Defendants.

Civil Action No. 03-12591-NMG

REPORT OF PARTIES' PLANNING MEETING PURSUANT TO FED. R. CIV. P. 26(f) AND
LOCAL RULE 16.1

1. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1, a meeting was held on June 15, 2005, by telephone and was attended by:

- a. Doris King for the plaintiff;
- b. Jeffrey M. Cohen for defendant.

2. PRE-DISCOVERY DISCLOSURES. The parties will complete initial disclosures, pursuant to Rule 26(a)(1), by July 1, 2005.

3. DISCOVERY PLAN. The parties jointly propose to the Court the following discovery plan:

- a.. The parties recommend that all fact discovery be completed by February 28, 2006. The parties expects there may be some expert discovery as well.
- b. The parties agree on a maximum of 25 interrogatories, including all discrete subparts, by each side. Responses due 30 days after service.

c. The parties agree on a maximum of 50 requests for admission by each party. Responses due 30 days after service.

d. The parties agree on a maximum of 10 depositions by each side.

e. The parties agree that each deposition will be limited to a maximum of 7 hours unless extended by agreement of parties or by leave of the Court.

4. OTHER ITEMS.

a. The parties request a pretrial conference in the normal course of scheduling.

b. The parties agree that the deadline for the parties to amend the pleadings shall be August 24, 2005.

c. The parties agree that dispositive motions shall be filed by March 31, 2006. Responses are due by April 30, 2006.

d. The plaintiff may consent to trial by magistrate but does not do so at this time.

5. CERTIFICATIONS

a. The parties will file the appropriate certifications pursuant to Local Rule 16.1(D)(3) separately.

/s/ Jeffrey M. Cohen
Jeffrey M. Cohen
Assistant United States Attorney
Counsel for the Defendant

/s/ Doris King
Doris King
Plaintiff

Dated: June 17, 2005